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October 28, 2014

Mr. Joe Karkoski
Regional Water Quality Control Board
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

Re: Proposed Nitrogen Management Plan Template

Dear Mr. Karkoski,

Innovative Ag Services is an agricultural consulting firm that provides agronomy services in California through a team of Certified Professional Agronomists, Certified Crop Advisors, and Technical Service Providers who are experienced and trained in Nutrient Management Plans. We have reviewed the proposed Nitrogen Management Plan Template, hereafter referred to as the Proposed Template, which is available on the RWQCB website. Thank you for requesting public comment to this important step, as it will have significant effects on agriculture.

While our team of Agronomists have compiled a comprehensive list of questions and concerns regarding the Proposed Plan Template, we would like to comment on three key points:

1. More time is needed to complete a NMP.

a. Professionalism and certification requires more time.

Within the General Order of Irrigated Lands Regulatory Program (ILRP), the RWQCB has required third party professionals in Nutrient Management Planning to develop and certify a professional document for a very diverse and large group of growers. To do this right, it will take time. As Professional Agronomists, our firm does not prepare nor certify nutrient budgets without professional standards. Site visits, review of monitoring data, yield history, soil types, laboratory data, and many other items can drastically affect a Nutrient Management Plan. Asking growers and agronomic professionals to complete a Nitrogen Management Plan within only months after approving a Nitrogen Management Plan Template places water quality and agronomic production at risk. We respectfully ask that the RWQCB give sufficient time for growers and agronomic professionals to complete this critical component of the ILRP.

b. Unknown designation of High Vulnerability Area.

Third Party Water Quality Coalitions are still working on their Groundwater Assessment Report. Many of these reports are not expected to be completed until



early next year. After such, the RWQCB will need to review and accept High/Low vulnerability areas. This will leave little to no time for growers to retain agronomic professionals to meet the additional requirements of High Vulnerability Areas.

c. Industry support and opportunity for funding require more time.

Trade Associations, Commodity Groups, Government Agencies, Professional Associations, and Professional Firms are aware of the requirements that the ILRP will place on the farming industry. These associated groups have a vested interest to assist growers, yet their assistance is limited until the RWQCB adopts a Proposed Template. It is only after the NMP Template is approved that industry support and funding can be implemented. Placing a very limited timeframe from the adoption of a Nitrogen Management Plan Template to its required completion/certification greatly limits the critical role of these supportive industry associations. Specifically, private and public grant funding to implement agronomy is being pursued and available, yet is dependent on the Nitrogen Management Plan Template. More time is needed between the adoption of a Template and the require time to complete the Nitrogen Management Plan.

2. Provide clarification and definitions to agronomic terms.

Nitrogen comes in many different forms and will change forms based on numerous environmental factors. The Proposed Template asks for the “Available Nitrogen” without providing a definition for “Available Nitrogen”. The use of this terminology is subjective in the agronomic field. Even while chemical form(s) of nitrogen may be able to define “Available Nitrogen”, additional clarifications will then be needed to determine the changes to nitrogen forms to and from that state(s). We respectfully request that the term “Available Nitrogen” be omitted from any regulatory reporting requirements as identified in the Proposed Template.

3. Provide clarification and definitions to reporting terms.

The Proposed Template identifies the “Crop Year, Recommended” as “the year/crop that an approved party would be making the nitrogen application recommendation”. The Proposed Template also identifies the “Crop Year, Actual” as the “year or season a crop is produced”. The language is vague and can be interpreted differently by RWQCB staff, growers, and agronomic consultants alike. The very diverse